



July 3, 2000

Sacramento Regional Wastewater

Treatment Plant

3521 Laguna Station Road

Elk Grove

California

95758-9550

Tele: [916] 375-9000

Fax: [916] 375-9062

Website: www.srscsd.com

Ms. Judy Heath

CALFED

1416 9<sup>th</sup> Street, Room 1148

Sacramento, CA 95814

Dear Ms. Heath,

**Subject: Comments on draft CALFED Science Program Scope and Functions**

Sacramento County Regional Sanitation District staff have reviewed the subject draft and offer the following comments:

The document appears to center on the concept of creating a large monitoring program conducted directly by the CALFED agencies. There is a need for centralized coordination of a comprehensive monitoring and assessment program to serve CALFED needs. This would certainly be an appropriate role for the CALFED agencies. A major aspect of this role would be to develop consistent work plans in each area of CALFED interest. The CALFED agency role should also include strong components to develop standardized methodology, quality assurance/quality control, and data management policies, along with a strong communications component. CALFED agencies should also play an important role in data interpretation and assessment, and in the formulation of recommendations for consideration by CALFED policy makers. However, where monitoring and assessment programs are already established by local or regional entities, or can be established by such entities, these programs should be given precedence for actual conduct of the monitoring activities. Only where no local or regional entity can be incorporated into the CALFED monitoring program should the CALFED agencies assume a direct monitoring role.

The CALFED comprehensive monitoring and assessment program must, by necessity, be very large and very complex. Direct, centralized operation of such a program will likely result in inefficiency, lack of program responsiveness, lack of adequate program oversight, lack of communications with knowledgeable local interests, and attendant high cost. On the other hand, decentralizing the program while maintaining strong centralized planning, standardization, quality control, and interpretative capabilities will have many advantages, among which are:

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Ms. Judy Heath  
July 3, 2000  
Page 2

- positive community involvement in the CALFED program, including citizen involvement (such as enlisting students in voluntary water quality assessment and improvement activities).
- increased stake in success of CALFED on the part of local communities.
- increased program responsiveness to changing local circumstances.
- improved technical and administrative program oversight.
- access to specialized scientific expertise available through local and regional entities.
- improved scientific independence from political influence.
- cost effectiveness.

The current draft scope and functions document would rely on a giant centralized entity to solve the complex problems of the Bay-Delta estuary. This approach has been tried several times over the past three decades, and has consistently failed. The CALFED promise has been a radically new "stakeholder driven" approach to collective involvement in creating solutions that can be widely agreed upon and cooperatively implemented. Modifying the monitoring program concept to fulfill CALFED's promise to truly focus on stakeholder involvement will not only assure public acceptance of the program, but will also help to assure its success.

Sincerely,

  
Mary James  
Senior Civil Engineer

cc: W. Kido  
J. Troyan  
T. Grovhoug  
R. Woodard